

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*¹

Liquidating Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Hearing Date: November 3, 2023 at 10:00 a.m. (ET)
Obj. Deadline: October 19, 2023 at 4:00 p.m. (ET)

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on October 5, 2023, Pacific Investment Management Company LLC and PIMCO Investments LLC filed the *Motion of the PIMCO Parties for Contempt for Violations of the Court's Enforcement Order and Confirmation Order* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **October 19, 2023 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge, at the Court, 824 North Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801 on **November 3, 2023 at 10:00 a.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE
MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction were: First Guaranty Mortgage Corporation (“FGMC”) (9575); and Maverick II Holdings, LLC (“Maverick”) (5621). The service address for FGMC is 13901 Midway Road, Ste. 102-334, Dallas, Texas 75244.

**THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE
MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: October 5, 2023

/s/ Robert J. Stearn, Jr.

Robert J. Stearn, Jr. (No. 2915)
Sarah E. Silveira (No. 6580)
Zachary J. Javorsky (No. 7069)
RICHARDS, LAYTON & FINGER P.A.
One Rodney Square
920 N. King Street
Wilmington, DE 19801
Telephone: 302-651-7700
Email: stearn@rlf.com
silveira@rlf.com
javorsky@rlf.com

-and-

SCHULTE ROTH & ZABEL LLP
Peter H. White
Noah N. Gillespie
555 13th Street NW, Suite 6W
Washington, DC 20004
Telephone: 202.729.7476
Email: pete.white@srz.com
noah.gillespie@srz.com

(Admitted *Pro Hac Vice*)

-and-

Kristine Manoukian (No. 5509)
Kelly V. Knight (Admitted *Pro Hac Vice*)
Paulina Piasecki (Admitted *Pro Hac Vice*)
919 Third Avenue
New York, NY 10022
Telephone: 212.756.2466
Email: kristine.manoukian@srz.com
kelly.knight@srz.com
paulina.piasecki@srz.com

*Counsel for Pacific Investment
Management Company LLC and PIMCO
Investments LLC*